



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

February 24, 2003

Ms. Gwen Knittweis
North Delta Project Manager
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Knittweis:

Notice of Preparation/Notice of Intent to Prepare a Joint Environmental Impact Statement/Environmental Impact Report for the Proposed North Delta Improvements Project

The Metropolitan Water District of Southern California (Metropolitan) has received and reviewed a copy of the Notice of Preparation/Notice of Intent (NOP/NOI) to Prepare a Joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Proposed North Delta Improvements Project (NDIP). The project would implement flood control improvements in the northern Sacramento-San Joaquin Delta, principally on and around Staten Island, Dead Horse Island, and McCormack-Williamson Tract, in a manner that would benefit aquatic and terrestrial habitats and alleviate flood-related problems in the North Delta area. The U.S. Army Corps of Engineers (Corps) is acting as the Lead Agency under the National Environmental Policy Act (NEPA), and the California Department of Water Resources (DWR) is acting as the Lead Agency under the California Environmental Quality Act (CEQA). The Corps and DWR are initiating the NDIP Feasibility Study for a portion of the Sacramento-San Joaquin Delta, and will closely coordinate the development of the Feasibility Study with the draft EIS/EIR, which will document existing conditions, project actions, and project effects. This letter contains Metropolitan's response as a potentially affected agency to the NOP/NOI.

Background

The joint state-federal CALFED Bay-Delta Program (CALFED) was formed to develop and implement a long-term comprehensive plan to restore ecological health and improve water management for beneficial uses of the Bay-Delta system. The CALFED Programmatic EIS/EIR (PEIS/EIR) and Programmatic Record of Decision (ROD) were issued in July and August 2000, respectively. The CALFED ROD identifies, as a component of conveyance actions, the NDIP, which is to design and construct floodway improvements in the North Delta (such as on the

lower Mokelumne River and Georgiana Slough) to provide conveyance, flood control, and ecosystem benefits. The CALFED ROD also identified other improvements to the North Delta, including potential changes in the operation of the Delta Cross Channel and an evaluation of a through-Delta facility on the Sacramento River. The NDIP will not be addressing these improvements.

Water Quality

The summary of the scoping process included in the NOP/NOI indicates that the "...short term effects on water quality associated with excavation and dredging in bodies of water..." will be addressed in the draft EIS/EIR for the NDIP. Metropolitan requests that the draft EIS/EIR include a full evaluation of the potential water quality effects of the proposed project, both long-term and short-term, negative and positive, on municipal water supplies obtained from the Delta. In particular, the analysis of project alternatives should include evaluation of the impacts on organic carbon levels (measured as dissolved organic carbon [DOC] and/or total organic carbon [TOC]) at the export locations in the south Delta. We suggest that the Corps and DWR consult two sources of information in performing this evaluation. The first source of information that should be considered is ongoing studies supported by the CALFED Ecosystem Restoration and Science programs that investigate the role of wetlands in carbon production in the Delta and the processes driving organic carbon concentrations at the Delta export locations. The second source of information that should be considered is the In-Delta Storage Program investigations currently being conducted by DWR, which include evaluation of organic carbon loading from flooded Delta islands.

In addition to evaluation of organic carbon, Metropolitan requests that the analysis of project alternatives in the draft EIS/EIR include evaluation of impacts on salinity and bromide levels at the export facilities in the south Delta resulting from changes in hydrodynamics and seawater intrusion due to physical modification of the system. This evaluation should include consideration of both seasonal and year-type variation.

Relationship to Other CALFED Program Elements

The summary of the scoping process included in the NOP/NOI indicates that the draft EIS/EIR will address "...the cumulative impacts of implementation of alternatives in conjunction with other past, present, and reasonably foreseeable future actions." Metropolitan believes the evaluation of cumulative impacts is very important since there are currently many proposed actions in the Delta being studied and considered by CALFED. We recommend that the draft EIS/EIR include evaluation of the cumulative effects of implementing the NDIP in conjunction with other Delta improvements currently being considered and studied by CALFED. In particular, the operational studies for the Delta Cross Channel, the evaluation of a through-Delta facility, the evaluation of flooded island reclamation in the Delta (such as Franks Tract), levee

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improvements, In-Delta storage, and ecosystem restoration in the Delta should be considered in the evaluation of cumulative impacts.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this project. If we can be of further assistance, please contact Ms. Lynda Smith at (916) 650-2632.

Very truly yours,



(for)

Laura J. Simonek
Manager, Asset Management
and Facilities Planning Unit

JAH/rdl

(Public Folders/EPU/Letters/24-FEB-03A.doc - Gwen Knittweis)